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November 12, 1996

JULIE C. KIM
202-457-7117

VIA HAND DELIVERY

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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NOV 12 1996

Federal Communications Commission
Office of Secretary

Re: MM Docket No. 96-196; RM-8878

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Transmitted herewith, on behalf of Coastline Communications of Carolina, Inc. ("Coastline"), are an original and four copies of Coastline's Comments with regard to the Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations in the above-referenced docket.

If any questions should arise in the course of your consideration of this matter, please communicate with the undersigned.

Very truly yours,

HOLLAND & KNIGHT

By: 
Julie Chung Kim

Enclosure

No. of Copies rec'd 024
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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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Federal Communications Commission
Office of Secretary

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 96-196
Table of Allotments,)	RM-8878
FM Broadcast Stations.)	
(Georgetown and Garden City,)	
South Carolina))	
To: Chief, Allocations Branch		

**COMMENTS OF
COASTLINE COMMUNICATIONS OF CAROLINA, INC.**

1. Coastline Communications of Carolina, Inc. ("Coastline"), by its attorneys and pursuant to Section 1.415 of the Commission's Rules, hereby submits its comments in support of its proposal to amend the FM Table of Allotments by reallocating Channel 249C1 from Georgetown, South Carolina to Garden City, South Carolina and to modify Station WWXM(FM)'s license accordingly. See Notice of Proposed Rulemaking, DA 96-1540, released September 20, 1996 ("NPRM").

2. Coastline supports the allotment of Channel 249C1 to Garden City, South Carolina and requests that the Commission modify its authorization accordingly. As the operation of WWXM from its existing site places principal city coverage over the entire community of Garden City, no modification of station facilities is required. See Attachment A (technical support statement).

3. In its NPRM, the Commission requested that Coastline provide specific information to demonstrate "whether Garden City has any commercial, social, economic, cultural, or religious organizations, municipal services, or governmental units that identify themselves specifically with that locality." NPRM at ¶ 3. In response to this request, Coastline submits the following information:

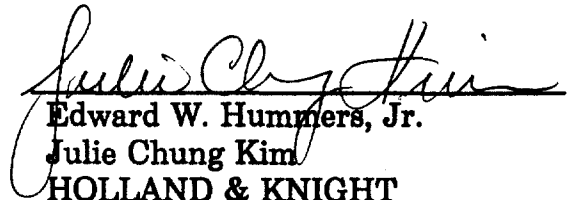
4. Garden City has numerous commercial organizations that identify themselves specifically with that locality. See Attachment B (page from local telephone book). Garden City Supermarket, Garden City Motor Inn, Garden City Realty, and Garden City Furniture Company are among these commercial entities. See id. Garden City has also formed a merchants' association together with its neighbor, Surfside Beach.

5. In addition to these commercial entities, Garden City has a religious organization, fire department and a counselling center, which identify themselves as Garden City Baptist Church, Garden City Fire Department and Garden City Counselling Center, respectively.

6. Garden City also appears as a discrete community on maps of South Carolina. See, e.g., Attachment C (map of South Carolina taken from 1994 Gousha New Deluxe Road Atlas).

7. Based on the foregoing, Coastline respectfully requests that the Commission find that Garden City is an identifiable community, distinct from Myrtle Beach, and amend the FM Table of Allotments, Section 73.202(b) of the Commission's Rules to reallocate Channel 249C1 from Georgetown, South Carolina to Garden City, South Carolina.

Respectfully submitted,


Edward W. Hummers, Jr.
Julie Chung Kim
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Counsel for Coastline
Communications of Carolina, Inc.

November 12, 1996

WAS1-211766

ATTACHMENT A

**Technical Statement in Support
of Proposed Rulemaking
to Amend § 73.202(b), Table of FM Allotments**

on behalf of

**Coastline Communications of Carolina, Inc.
WWXM 97.7 FM, Channel 249C1**

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ENGINEERING STATEMENT

prepared for

COASTLINE COMMUNICATIONS OF CAROLINA, INC.

RADIO STATION WWXM

GEORGETOWN, SOUTH CAROLINA

This Engineering Statement has been prepared for Coastline Communications of Carolina, Inc., licensee of FM broadcast station WWXM, serving Georgetown, South Carolina on channel 249C1. The instant Statement discusses 1) the mutual exclusivity that would obtain with the existing WWXM assignment if the Commission's Table of Allotments were amended to specify a new community of license, and 2) the existence of other Georgetown FM services besides WWXM.

1. Mutual Exclusivity between the Existing WWXM Assignment and the Proposed Modification

WWXM currently operates on channel 249C1. Section 73.207 of the Commission's Rules specifies a co-channel separation distance of 245 kilometers for Class C1 facilities. The principal city contour for a maximum class C1 facility operating at 100 kilowatts effective radiated power with an antenna height above average terrain of 299 meters extends approximately 50 kilometers. The present WWXM facility provides predicted 70 dBu (3.16 mV/m) coverage of both Georgetown and Garden City. Transmitter sites serving these cities could not be further than 100 kilometers apart (2 x 50 kilometers). Thus, a change in assignment to Garden City as the community of license must result in a facility that is mutually exclusive with the existing WWXM assignment.

2. Other Facilities Providing Local Service to Georgetown, South Carolina

A search of the FCC's engineering data base shows two full-service FM stations, and two AM stations besides WWXM, that are currently licensed to Georgetown, South Carolina.

ENGINEERING STATEMENT

prepared for

COASTLINE COMMUNICATIONS OF CAROLINA, INC.

RADIO STATION WWXM

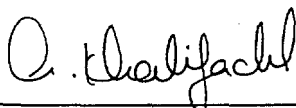
GEORGETOWN, SOUTH CAROLINA

August 23, 1996

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These stations are 1) WSYN, channel 293C2, FCC File No. BLH-880726KA, 2) WSCA, channel 229A, FCC File No. BLH-930420KA, 3) WGTN (AM), 1400 kHz, FCC File No. BL-851213AQ and 4) WLMC (AM), 1470 kHz.

If there are any questions concerning the above, please contact the undersigned.



Abdolmajid Khalilzadeh

August 23, 1996

Philip A. Rubin & Associates, Inc.

1350 Connecticut Avenue, NW

Suite 610

Washington, DC 20036

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ATTACHMENT B

AREA CODE 803

GARAGE DOORS OF WOLVES

GARDEN CITY FURNITURE CO.

GARDEN CITY REALTY INC.

608 Atlantic Ave. Grdn City 651-2

Garden City Seafood 2833 Hwy 17 S... 651-4...

GARDEN CITY STORAGE

100-443885-250

GARDNER, JOHNNY ATTY

4216 Main N Myrtle Beach ... 249-615

[illegible]

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—מחזורי חיים

ATTACHMENT C

